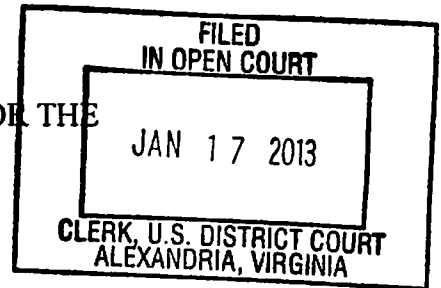


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)	CRIMINAL NO. 1:13-CR-38
)	
)	The Honorable Claude M. Hilton
)	
v.)	Count 1 - 18 U.S.C. § 1029(b)(2) and
)	1029(a)(5)
RICHARD ARDEN LEONARD,)	(Conspiracy to Commit Access Device
JAMES LEONARD HARRIS, and)	Fraud)
RAYMOND FREDERICK GOSS,)	
)	Forfeiture – 18 U.S.C. § 982(a)(2)(B)
Defendants.)	(Forfeiture of Property Constituting, or
)	Derived from, Proceeds Obtained from
)	Violation of 18 U.S.C. § 1029)

INDICTMENT

JANUARY 2013 TERM - at Alexandria, Virginia

THE GRAND JURY CHARGES THAT:

Introduction

1. An “access device,” as defined in Title 18, United States Code, Section 1029(e)(1), is, among other things, a credit card, credit card number, or other means to access an account that can be used, alone or in conjunction with another access device, to obtain money, goods, services, or any other thing of value.

COUNT 1

2. From on or about September 28, 2012, through at least on or about November 8, 2012, in Arlington Count, Virginia, within the Eastern District of Virginia, and elsewhere, the defendants, RICHARD ARDEN LEONARD, JAMES LEONARD HARRIS, and RAYMOND FREDERICK GOSS, unlawfully, knowingly, and intentionally did combine, conspire, confederate, and agree with others, both charged and uncharged, and both known and unknown to the grand jury, to commit access device fraud, in violation of Title 18, United States Code, Section 1029, to wit:

- a) to knowingly and with intent to defraud effect transactions, with one or more access devices issued to another person or persons, to receive payment or any other thing of value during a one-year period the aggregate value of which is equal to or greater than \$1,000, in violation of Title 18, United States Code, Section 1029(a)(5).

Manner and Means of the Conspiracy

3. It was a part of the conspiracy that the defendants, RICHARD ARDEN LEONARD, JAMES LEONARD HARRIS, and RAYMOND FREDERICK GOSS, broke into vehicles parked in the parking lots of the Chesapeake and Ohio Canal National Park, the Great Falls National Park, and the Theodore Roosevelt Island National Park and stole, among other items, credit and debit cards issued to other persons.

4. It was further part of the conspiracy that the defendants, RICHARD ARDEN LEONARD, JAMES LEONARD HARRIS, and RAYMOND FREDERICK GOSS, used those

stolen credit and debit cards to make purchases at stores located in Virginia, Maryland, and the District of Columbia.

OVERT ACTS

5. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Eastern District of Virginia and elsewhere:

a. On or about September 28, 2012, the defendants, RICHARD ARDEN LEONARD, JAMES LEONARD HARRIS, and RAYMOND FREDERICK GOSS, broke the right front passenger window of a vehicle parked in the Wide Water parking lot of the Chesapeake and Ohio Canal National Park, located in Potomac, Maryland, and stole, among other personal items, five credit cards. The credit cards stolen from the vehicle included a MasterCard in the name of C.L. bearing an account number ending in 8491 and a MasterCard in the name of C.L. bearing an account number ending in 8062.

b. On or about September 28, 2012, the defendants, RICHARD ARDEN LEONARD, JAMES LEONARD HARRIS, and RAYMOND FREDERICK GOSS, used the MasterCard in the name of C.L. bearing an account number ending in 8491 to make a purchase in the amount of \$123.85 at a 7-11 store located at 2311 South 2nd Street, Arlington, Virginia, in the Eastern District of Virginia.

c. On or about September 28, 2012, the defendants JAMES LEONARD HARRIS and RAYMOND FREDERICK GOSS, used the MasterCard in the name of C.L. bearing an account number ending in 8062 to make a purchase totaling \$72.55 at a CVS store located at 4859 MacArthur Boulevard, N.W., in the District of Columbia.

d. On or about October 24, 2012, the defendants RICHARD ARDEN LEONARD, JAMES LEONARD HARRIS, and RAYMOND FREDERICK GOSS, broke the rear driver's side window of a vehicle in the parking lot at Great Falls Park in Potomac, Maryland, and removed from inside the vehicle, among other person items, three credit cards. The credit cards stolen from the vehicle included a Visa card in the name of B.S. bearing an account number ending in 5053, a Visa card in name of B.S. bearing an account number ending in 6864, and a MasterCard in the name of B.S. bearing an account number ending in 9346.

e. On or about October 24, 2012, the defendants RAYMOND FREDERICK GOSS and RICHARD ARDEN LEONARD used the MasterCard in the name of B.S. bearing an account number ending in 9346 to make a purchase in the amount of \$122.48 at a CVS store located at 2601 Columbia Pike, Arlington, Virginia, in the Eastern District of Virginia.

f. On or about October 24, 2012, the defendant JAMES LEONARD HARRIS used the Visa card in the name of B.S. bearing an account number ending in 6864 to make a purchase in the amount of \$49.70 at the CVS store located at 2601 Columbia Pike, Arlington, Virginia, in the Eastern District of Virginia.

g. On or about October 24, 2012, the defendants RAYMOND FREDERICK GOSS and RICHARD ARDEN LEONARD used the MasterCard in the name of B.S. bearing an account number ending in 9346 to make two purchases in the amount of \$22.77 and \$348.74 at a Lowes store located at 10440 Campus Way South, Upper Marlboro, Maryland.

h. On or about October 24, 2012, the defendants, RICHARD ARDEN LEONARD, JAMES LEONARD HARRIS, and RAYMOND FREDERICK GOSS, used the Visa card in the name of B.S. bearing an account number ending in 5053 to make two purchases in the amounts

of \$49.70 and \$99.39 at a CVS store located at 1202 Hayes Street, Arlington, Virginia, in the Eastern District of Virginia.

i. On or about October 24, 2012, the defendant, RAYMOND FREDERICK GOSS, used the MasterCard in the name of B.S. bearing an account number ending in 9346 to make a purchase in the amount of \$551.25 for a Giant Roam 3 bicycle at Papillon Cycles located at 2809 Columbia Pike, Arlington, Virginia, in the Eastern District of Virginia.

j. On or about October 27, 2012, the defendant RAYMOND FREDERICK GOSS used the MasterCard in the name of B.S. bearing an account number ending in 9346 to make two purchases in the amounts of \$51.35 and \$50.64 at a 7-11 store located at 3003 Columbia Pike, Arlington, Virginia, in the Eastern District of Virginia.

(All in violation of Title 18, United States Code, Sections 1029(b)(2) and 1029(a)(5)).

FORFEITURE NOTICE

Pursuant to Rule 32.2(a), the defendants are hereby notified that, if convicted of the offense alleged in Count 1 above, they shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B), all right, title, and interest in any and all property, real or personal, which constitutes or is derived from proceeds traceable to the offense of conspiracy to commit fraud in connection with access devices; including, but not limited to, the following property:

- (a) A sum of money equal to at least \$1,598.75 in United States currency, representing the amount of proceeds obtained as a result of the conspiracy to violate 18 U.S.C. §1029.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by 18 U.S.C. § 982(b), the defendants shall forfeit substitute property, up to the value of the amount described in subparagraph a, if, by any act of omission of the defendant, the property described in subparagraph a, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; or has been commingled with other property which cannot be divided without difficulty.

(In accordance with Title 18, United States Code, Section 982 and Rule 32.2(a), Federal Rules of Criminal Procedure).

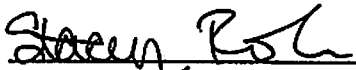
A TRUE BILL:

Pursuant to the E-Government Act,
the original of this page has been filed
under seal at the Clerk's Office.

FOREPERSON

Neil H. MacBride
United States Attorney

By:



Stacey E. Rohrs
Special Assistant United States Attorney

Michael P. Ben'Ary
Assistant United States Attorney